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KVP, LP and KRM, INC. dba
THOMAS KELLER RESTAURANT GROUP*

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

U.S. EQUAL EMPLOYMENT OPPORTUNITY
COMMISSION,

Plaintiff,

vs.

KVP, LP dba BOUCHON RESTAURANT;
KRM, INC. dba THOMAS KELLER
RESTAURANT GROUP; DOES 1-10, inclusive;

Defendants.

Case No.: 2:23-CV-01308-JCM-EJY

**STIPULATION AND ORDER TO
EXTEND TIME FOR DEFENDANTS
KVP, LP AND KRM, INC. TO FILE
OPPOSITION TO MOTION TO
COMPEL**

Pursuant to LR 7-1 and LR IA 6-1, Defendants KVP, LP dba Bouchon Restaurant (“Bouchon”) and KRM, Inc. dba Thomas Keller Restaurant Group (“KRM”) (collectively “Defendants”), by and through their attorneys, Michael D. Bruno, Esq., Michael A. Laurenson, Esq. and Dione C. Wrenn, Esq. of the law firm of Gordon Rees Scully Mansukhani LLP and Plaintiff U.S. Equal Employment Opportunity Commission (“EEOC”) by and through its attorneys hereby stipulate and agree as follows:

1. EEOC filed a Motion to Compel Defendants' Further Responses pursuant to Local Rule 26-6 ("Motion to Compel") on November 19, 2024 [ECF No. 33].

1 2. Defendants' Opposition to Motion to Compel is currently due on December 3,
2 2024.

3 3. Defendants request additional time to file their Opposition December 10, 2024.

4 4. EEOC does not oppose Defendants' requested extension.

5 5. Accordingly, Defendants will file their Opposition to Motion to Compel on
6 December 10, 2024.

7 6. This request for extension is made in good faith and is not sought for any
8 improper purpose or delay.

9 **IT IS SO STIPULATED.**

10 DATED this 3rd day of December 2024.

11 **GORDON REES SCULLY
12 MANSUKHANI**

13 /s/ Dione C. Wrenn

14 MICHAEL D. BRUNO, ESQ.

15 (*Admitted Pro Hac Vice*)

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22 *Attorneys for Defendants,
23 KVP, LP and KRM, INC. dba
24 THOMAS KELLER RESTAURANT
25 GROUP*

10 DATED this 3rd day of December 2024.

11 **U.S. EQUAL EMPLOYMENT
12 OPPORTUNITY COMMISSION**

13 /s/ Andrea E. Ringer

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23 *Attorneys for Plaintiff,
24 U.S. EQUAL EMPLOYMENT
25 OPPORTUNITY COMMISSION*

26 **IT IS SO ORDERED.**

27 
28 UNITED STATES MAGISTRATE JUDGE

29 **DATED: December 3, 2024**